

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

In Re Innovatio IP Ventures, LLC, Patent Litigation	Case No. 1:11-cv-09308
This Document Relates To: Innovatio IP Ventures, LLC v. Quantenna Communications, Case No. 1:16-cv-09452 (N.D. Ill)	Judge Elaine E. Bucklo Magistrate Judge Sidney Schenkier

**INNOVATIO IP VENTURES, LLC AND
QUANTENNA COMMUNICATIONS, INC.'S JOINT PROPOSED CASE SCHEDULE**

Pursuant to the Court's Minute Entry dated September 29, 2017, the parties hereby submit the following Joint Proposed Case Schedule¹:

EVENT	DUE DATE
Initial Infringement Contentions (LPR 2.2)	12/20/2017
Initial Noninfringement, Unenforceability and Invalidity Contentions (LPR 2.3)	1/8/2018
Initial Response to Invalidity Contentions (LPR 2.5)	1/22/2018
Final Infringement, Unenforceability and Invalidity Contentions (LPR 3.1)	5/16/2018
Final Noninfringement, Enforceability and Validity Contentions (LPR 3.2); Last day to seek stay pending reexamination (LPR 3.5)	6/13/2018

¹ As to the original action filed in Illinois, Quantenna contends that both personal jurisdiction and venue are improper and that, accordingly, this action should have been originally filed in the Northern District of California. Quantenna recognizes that, in light of the MDL order, Dkt. 1282, this action if originally properly filed, is transferrable to this District for certain pretrial proceedings pursuant to 28 U.S.C. § 1407. Quantenna has asked Innovatio to stipulate that proper venue and jurisdiction lie in the Northern District of California. Innovatio believes that venue and jurisdiction properly lie in this District. The parties are expected to have further settlement discussions within the next 30 days in order to resolve this litigation. In the event this litigation is not resolved, Quantenna expects motion practice as to personal jurisdiction and venue.

Exchange of Proposed Claim Terms to be Construed along with Proposed Constructions (LPR 4.1)	6/27/2018
Meet and confer to select 10 terms to be presented to Court for construction (LPR 4.1b)	7/4/2018
Close of Fact Discovery-Initial (LPR 1.3)	7/25/2018
Opening Claim Construction Brief by party opposing infringement and Joint Appendix (LPR 4.2a)	8/1/2018
Responsive Claim Construction Brief by party claiming infringement (LPR 4.2c)	8/29/2018
Reply Claim Construction Brief by party opposing infringement (LPR 4.2c-d)	9/12/2018
Joint Claim Construction Chart and Status Report (LPR 4.2f)	9/19/2018
Claim Construction Hearing (LPR 4.3)	10/10/2018
Claim Construction Ruling and reinstatement of fact discovery (LPR 1.3)	TBD
Discovery Concerning Opinions of Counsel (LPR 3.6)	TBD
Close of Fact Discovery-Final (LPR 1.3)	TBD
Initial Expert Reports (LPR 5.1b)	TBD
Rebuttal Expert Reports (LPR 5.1c)	TBD
Depositions of Experts (LPR 5.2)	TBD
Final Day for Filing Dispositive Motions (LPR 6.1)	TBD
Case Ready for Trial (LPR Schedule)	TBD

Respectfully submitted,

Dated: October 13, 2017

/s/ Matthew G. McAndrews

John E. Lord
jlord@onellp.com
William O'Brien
wobrien@onellp.com
ONE LLP
9301 Wilshire Boulevard
Penthouse Suite
Beverly Hills, CA 90210
Telephone: (310) 866-5157
ADMITTED PRO HAC VICE

Joseph Kuan Liu
jliu@onellp.com
ONE LLP
4000 Macarthur Boulevard
East Tower, Suite 500
Newport Beach, CA 92660
Telephone: (949) 502-2870
ADMITTED PRO HAC VICE

Matthew G. McAndrews
Kyle D. Wallenberg
Niro McAndrews, LLC
200 West Madison Street, Suite 2040
Chicago, Illinois 60606
Telephone: (312) 755-8577
Email: mmcandrews@niro-mcandrews.com
Email: kwallenberg@niro-mcandrews.com

Attorneys for Plaintiff,
INNOVATIO IP VENTURES, LLC

/s/ Edward G. Poplawski

Edward G. Poplawski (*Pro Hac Vice*)
Neil N. Desai (*Pro Hac Vice*)
WILSON SONSINI GOODRICH & ROSATI PC
633 W. Fifth Street, Suite 1550
Los Angeles, CA 90071
323-210-2912 (Telephone)
866-974-7329 (Facsimile)

Steven P. Mandell
(ARDC #6183729)
MANDELL MENKES LLC
1 N. Franklin, Suite 3600
Chicago, IL 60606
Telephone: 312-251-1000
Facsimile: 312-251-1010

Attorneys for Defendant,
QUANTENNA COMMUNICATIONS, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 13, 2017, the foregoing **INNOVATIO IP VENTURES, LLC AND QUANTENNA COMMUNICATIONS, INC.'S JOINT PROPOSED CASE SCHEDULE** was filed with the Clerk of the Court via CM/ECF, which will send notifications of such filing via electronic mail to all counsel of record.

/s/ Matthew G. McAndrews
Attorney for Plaintiff,
INNOVATIO IP VENTURES, LLC